

BLANK ROME LLP  
Attorneys for Capital Automotive L.P.  
The Chrysler Building  
405 Lexington Avenue  
New York, New York 10174  
(212) 885-5000  
Andrew B. Eckstein (AE 6142)

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
In re: Chapter 11  
Case No. 08-13555 (JMP)  
LEHMAN BROTHERS HOLDINGS INC., *et al.*,  
(Jointly Administered)  
Debtors.  
----- X

**JOINDER OF CAPITAL AUTOMOTIVE L.P. TO OBJECTION TO  
DEBTOR'S MOTION OF THE DEBTORS, PURSUANT  
TO SECTION 502(B)(9) FOR ESTABLISHMENT OF THE DEADLINE FOR  
FILING PROOFS OF CLAIM, APPROVAL OF THE FORM AND MANNER  
TO IMPLEMENT ALTERNATIVE DISPUTE RESOLUTION PROCEDURES FOR  
AFFIRMATIVE CLAIMS OF DEBTORS UNDER DERIVATIVE CONTRACTS**

Capital Automotive L.P. ("CALP"), by and through its undersigned counsel, hereby joins  
in the Objection of the Royal Bank of Scotland PLC and Affiliates [D.I.# 4544] to the Debtor's  
Motion for Authorization to Implement Alternative Dispute Resolution of Affirmative Claims of  
Debtors Under Derivative Contracts [D.I.# 4453] (the "ADR Motion"), and asserts as follows:

**OBJECTION AND JOINDER**

1. CALP Merger, L.P., predecessor in interest to CALP and the Debtors were parties to certain derivative contracts.
2. CALP hereby joins and incorporates by reference the arguments, in their entirety, made by the Royal Bank of Scotland and Affiliates in their Objection [D.I.# 4544] to the ADR Motion [D.I.# 4453].

**WHEREFORE**, CALP respectfully requests that the Court deny the ADR

Motion, and grant such other and further relief as deemed just and proper.

Dated: New York, New York  
July 31, 2009

BLANK ROME LLP  
Attorneys for Capital Automotive L.P.

By: /s/ Andrew B. Eckstein  
Andrew B. Eckstein  
Rocco A. Cavaliere  
The Chrysler Building  
405 Lexington Avenue  
New York, New York 10174  
(212) 885-5000